

UNITED STATES DISTRICT & BANKRUPTCY COURT
Southern District of Texas

United States Courts
Southern District of Texas
FILED

SEP 20 2019

NO. H-19-450

David J. Bradley, Clerk of Court

I, Broderick James would like to submit additional exhibits to help expedite my motion alone which I have just received today.

- Copy of check from TFB
- Copy of Motion of Attorney to withdraw without imposing a fee

Thanks,



+ Broderick James

20 Sept 19

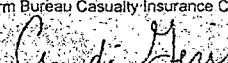
Date: Amount Paid:
07/03/2019 \$50,000.00
Claim Number: Policy Number:
424958 23001710

EET JRC 45805-23

Payee Name and Address:

STERN LAW GROUP
AND BRODERICK JAMES
4909 BISSONNET ST STE 100
BELLAIRE, TX 77401-4051

[Barcode]

 Texas Farm Bureau Casualty Insurance Company P.O. Box 2689 / Waco, Texas 76702-2689		56-382 412	7479280
NOT VALID AFTER ONE YEAR			
In Full Payment For:	ANY AND ALL CLAIMS	DATE	PAY THIS AMOUNT
		07/03/2019	\$50,000.00
Wells Fargo Bank, N.A.		Pay Only >	
PAY TO THE ORDER OF		SOURCE 7-CLAIMS-CHECK TRT Texas Farm Bureau Casualty Insurance Company  Authorized Signature	
THE FACE OF THIS DOCUMENT CONTAINS A COLORED BACKGROUND THE BACKER HAS AN ARTIFICIAL WATERMARK AND MICROPRINTING			

EX E1

Filing Submitted for Case: 18-E-0474; Broderick Dewayne James,Shaquall Monae Brown vs. Peter Erwin Salvatierra,Salvatierra Consultant, LLC,Lawrence Burnett, Jr.; Envelope Number: 36547977

From: No-Reply@eFileTexas.gov

To: jamesb8950@yahoo.com

Date: Thursday, September 5, 2019, 01:15 PM CDT



Courtesy Notification

Envelope Number: 36547977

Case Number: 18-E-0474

Case Style: Broderick Dewayne James,Shaquall Monae Brown vs. Peter Erwin Salvatierra,Salvatierra Consultant, LLC,Lawrence Burnett, Jr.

This is a courtesy notification for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	18-E-0474
Case Style	Broderick Dewayne James,Shaquall Monae Brown vs. Peter Erwin Salvatierra,Salvatierra Consultant, LLC,Lawrence Burnett, Jr.
Date/Time Submitted	9/5/2019 11:16 AM CST
Filing Type	EFileAndServe
Filing Description	Proposed Order Granting Withdrawal of Attorneys
Activity Requested	Proposed Order (Court Use)
Filed By	Tony Garza
Filing Attorney	Joseph Corteguera

Document Details	
Lead Document	Order of Withdrawal.pdf
Lead Document Page Count	1
File Stamped Copy	View Stamped Document
This link is active for 30 days.	

Ex E2

CAUSE NO. 18-E-0474

BRODERICK DEWAYNE JAMES
and
SHAQUALL MONAE BROWN

v.

PETER ERWIN SALVATIERRA,
LAWRENCE BURNETT, JR.
and
SALVATIERRA CONSULTANT, LLC

IN THE DISTRICT COURT OF

MATAGORDA COUNTY, TEXAS

130TH JUDICIAL DISTRICT

**MOTION TO WITHDRAW AS ATTORNEYS
BY JOSEPH R. CORTEGUERA, JEFFREY STERN AND STERN LAW GROUP**

TO THE HONORABLE JUDGE OF THIS COURT:

Now Come Joseph R. Corteguera, Jeffrey Stern and Stern Law Group and file this Motion asking this Court to allow them to withdraw as attorneys for Plaintiffs, BRODERICK DEWAYNE JAMES AND SHAQUALL MONAE BROWN, and in support would respectfully show the Court the following:

Good cause exists for the Plaintiffs' counsel to withdraw from this case due to a conflict of interest which has arisen and due to the stated desire of both Plaintiffs to terminate the representation. Plaintiffs BRODERICK DEWAYNE JAMES and SHAQUALL MONAE BROWN no longer want Joseph R. Corteguera, Jeffrey Stern and Stern Law Group to represent them in this matter. BRODERICK DEWAYNE JAMES and SHAQUALL MONAE BROWN have stated a desire to terminate their relationship Joseph Corteguera, Jeffrey Stern and Stern Law Group. Although Plaintiff Broderick James informed that he had hired an attorney who did communicate with Joseph Corteguera about the representation, to date new counsel for Broderick James has not made an appearance in this cause. Please see Certificate of Last Known Address, marked as Exhibit "A".

Ex E3

There is good cause for the Court to allow the Motion to Withdraw because it is no longer in the best interest for Plaintiffs BRODERICK DEWAYNE JAMES and SHAQUALL MONAE BROWN and Joseph Corteguera, Jeffrey Stern and the law firm of Stern Law Group to continue the attorney-client relationship in this matter.

A copy of this Motion will be mailed to Plaintiffs BRODERICK DEWAYNE JAMES and SHAQUALL MONAE BROWN via certified mail. Joseph R. Corteguera, Jeffrey Stern and the law firm of Stern Law Group have hereby notified Plaintiffs in writing, both by certified and First Class Mail, of their right to object to the Motion.

The following is a list of all pending settings and deadlines in this case:

Discovery Period Ends: September 20, 2019

Pretrial Hearing/Challenges to Expert Testimony: December 6, 2019 at 9:00 a.m.

Pretrial Filings: December 20, 2019

Trial: January 06, 2020

WHEREFORE PREMISES CONSIDERED, Joseph R. Corteguera, Jeffrey Stern and Stern Law Group move the Court for an order discharging them as attorneys of record for Plaintiffs in this case, and granting such other relief as the Court may deem proper and just.

Respectfully submitted,

STERN LAW GROUP

/s/ Joseph R. Corteguera

JOSEPH R. CORTEGUERA

SBN: 00787291

JEFFREY M. STERN

SBN: 19175660

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Bellaire, Texas 77401

(713) 661-9900 Telephone

(713) 666-5922 Facsimile

Email: eserviceJRC@stern-lawgroup.com

ATTORNEYS FOR PLAINTIFFS

Ex E4

CERTIFICATE OF CONFERENCE

Counsel for Defendants is unopposed to the filing of this motion.

/s/ Joseph R. Corteguera
JOSEPH R. CORTEGUERA

CERTIFICATE OF SERVICE

I certify that on the 5th day of September, 2019, a true and correct copy of the foregoing instrument has been forwarded by regular mail, commercial carrier, facsimile transmission, or e-mail in accordance with Rules 21 and 21a of the Texas Rules of Civil Procedure to:

Shaquall Monae Brown
P.O. Box 53
Cedar Lane, Texas 77415

James Broderick
P.O. Box 1709
Brazoria, Texas 77422

Via E-File:
John C. Kilpatrick
Law Offices of Kilpatrick, White & Deas
801 Louisiana, Suite 500
Houston, Texas 77002

Via E-File:
Gina A. Lucero
Lisa M. Hintz
TBN: 24041104
1776 Yorktown, Suite 100
Houston, Texas 77056

Via E-File:
David H. Bradley
2500 Tanglewilde, Suite 250
Houston, Texas 77063

/s/ Joseph R. Corteguera
JOSEPH R. CORTEGUERA